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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JOHN WILEY & SONS, INC.,

Plaintiff,

-against-

SHARON CHEN WU A/K/A SHI XUAN CHEN, HUALONG WU, STEVEN WU, DYNASTY DEPOT LLC AND LAKEFOREST LLC ALL D/B/A ANTIQUE_SALES D/B/A LAKE FORESTS D/B/A MONTGOMERY D/B/A BOOK_DEPOT AND JOHN DOE NOS. 1-5,

Defendants.

08 Civ. 8745 (LAP)

ECF Case

CASE MANAGEMENT PLAN

This Civil Case Management Plan, submitted in accordance with Rule 26(f), Fed. R. Civ. P., in accordance with Rule 16(f), Fed. R. Civ. P.

A. Initial Disclosures:

1. Plaintiff will serve voluntary disclosure under Rule 26(a) on defendants by March 27, 2009.

2. Defendants will serve voluntary disclosure under Rule 26(a) on plaintiff by March 27, 2009.

3. No changes in timing, form, or requirement for disclosures under Rule 26(a) should be made.

B. Subjects of Discovery: Discovery will be needed on the subjects of (i) the existence of sales or unlawful importation of copyrighted materials in violation of plaintiff's copyrights; (ii) the extent of any such infringing sales; and (iii) the profits obtained by defendants in any such infringing sales; (iv) the manufacturing/printing of the materials for which unlawful importation is alleged; (v) damages, if any, suffered by plaintiff as a result of the acts alleged in the complaint; (vi) the material differences alleged by plaintiff's between domestic and international editions of copyrighted materials; the alleged infringing use of plaintiff's trademark.

1. This will require separate depositions of defendants Sharon Chen a/k/a Shi Xuan Chen and Steven Wu a/k/a Hualong Wu, as well as subpoenas of third parties for documents. Discovery should be completed by July 10, 2009. Discovery need not be conducted in phases or limited to or focused on particular issues.
2. Plaintiff will serve its first set of document requests and interrogatories on defendants by April 3, 2009.
3. Defendants will serve their first set of document requests and interrogatories on plaintiff by April 3,

2009.

Dated: March 13, 2009
New York, New York

4. Any party wishing to make a dispositive motion shall request a pre-motion conference by letter stating the basis of the proposed motion no later than July 10, 2009. The opponent shall state its position by letter within one week of the movant's letter.

5. In the absence of a motion, all trial papers shall be filed by August 10, 2009

6. Counsel shall appear for a conference on July 21, 2009 at 9:00 am.

DUNNEGAN LLC

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SO ORDERED:

Loretta A. Preska
U.S.D.J.
March 22, 2009